

## FEDERAL ELECTION COMMISSION Washington, DC 20463

AUG - 8 2013

Robert C. Bonsib, Esq. MarcusBonsib, LLC 6411 Ivy Lane, Suite 116 Greenbelt, MD 20770

RE: MUR 6526

Cora Carper

Dear Mr. Bonsib:

On June 28, 2013, the Federal Election Commission ("Commission") voted to provide to the U.S. Attorney's Office for filing with the U.S. District Court for the District of Maryland a signed Addendum to Plea Agreement Concerning Conciliation of Civil Violations with the FEC ("Addendum"). As you know, on July 2, 2013, the District Court accepted the signed Addendum and incorporated it into the record in *United States v. Cora Carper*, Case. No. 8:12-CR-0593-GLR, together with the plea agreement. The Addendum constitutes the final conciliation agreement between your client, Cora Carper, and the Commission in MUR 6526. Accordingly, the Commission voted to close the file in MUR 6526 on August 2, 2013. Enclosed is a copy of the fully executed addendum/conciliation agreement for your files.

Documents related to MUR 6526 will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B).

If you have any questions, please contact me at (202) 694-1650.

Sincerely, Warm M. Shows this

Dawn M. Odrowski

Attorney

Enclosure
Addendum/Conciliation Agreement

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IN	THE	UNIT	ED S	TATE	S DI	STRIC	r cou	RT
	FOR	THE	DIS'	TRICT	OF	MARY	LAND	

	<b>SY</b>
UNITED STATES OF AMERICA	)
	)
٧.	) Crim. No. GLR 12-CR-0593
	)
CORA CARPER,	)
Defendant	)

## ADDENDUM TO PLEA AGREEMENT CONCERNING CONCILIATION OF CIVIL VIOLATIONS WITH THE FEC

- 1. Defendant acknowledges that the Federal Election Commission (FEC) has exclusive jurisdiction over civil enforcement of the federal campaign finance laws under the Federal Election Campaign Act of 1971, as amended. 2 U.S.C. §§ 431-57. That jurisdiction extends to violations of the Act and Commission regulations that result from the offense conduct that is the subject matter of the Plea Agreement in this criminal proceeding. See 2 U.S.C. § 432(b)(3); 11 C.F.R. § 102.15. Defendant further acknowledges that the FEC has the authority to seek civil remedies against her for these violations pursuant to 2 U.S.C. § 437g(a)(5).
- 2. Defendant admits that she knowingly and willfully violated 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15 by commingling at least \$180,000 in funds of the International Association of Heat and Frost Insulators & Allied Workers PAC with her personal funds.
- 3. Defendant agrees to cease and desist from violating 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15.
- 4. The FEC may seek a civil penalty for knowing and willful violations of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15 of up to 200 percent of any contribution or expenditure involved in such violations in accordance with 2 U.S.C. § 437g(a)(5)(B). In light of the financial circumstances of the Defendant and her entering into the terms of the Plea Agreement in this

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matter, including Paragraph 11 of that agreement (Restitution), the FEC seeks no civil penalty in its conciliation of this matter.

5. Defendant agrees not to volunteer or engage in work for any federal political committee or any federal campaign in a capacity involving finances or disclosure reports for a period of five (5) years from the date of the Plea Agreement.

ORITHE DEFENDANT

Cora Carper

FOR THE FEDERAL ELECTION COMMISSION

Anthony Herman General Counsel

BY:

Danfel A. Petalas

Associate General Counsel

for Enforcement

Date

Date

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